

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	Civil Action No. 1:90-cv-00229
)	
Plaintiff)	
)	
v.)	
)	
ROBERT BRACE, and ROBERT BRACE)	
FARMS, INC.,)	
)	
Defendants)	
)	

AFFIDAVIT OF BEVERLY OWENS BRACE

My name is Beverly Owens Brace. I am making this affidavit in support of Defendants Robert Brace and Robert Brace Farms, Inc. in the above referenced matter.

I am seventy-nine (79) years of age, currently retired, and reside at 1131 Route 97, Post Office Box 338, Waterford, Pennsylvania, 16441.

I previously worked for the Brace family farming business in Waterford, Pennsylvania in the packing shed packing potatoes and cabbage for several years when I was young, but without compensation. My role in this family business during the past fifty years has mostly been a role of providing support to the farmers in my family. Foremost, I have been a wife, a mother, a grandmother, and a great grandmother. (Ex. 1 Beverly Brace Depo 1-11-18 at pp. 18-25).

In this role, I have supported my husband, Robert Brace, in part, by accompanying him to each of the 2017 and 2018 depositions convened during the pre-trial discovery period of this case.

I particularly recall accompanying my husband to the deposition of former United States Department of Agriculture Soil Conservation Service representative Lewis Steckler on November

30, 2017, which had been convened at the downtown offices of our local Erie, Pennsylvania law firm, Knox, McGlaughlin Gornall & Sennett, P.C.

Prior to the start of the deposition scheduled for approximately 1:00 p.m., I recall observing Mr. Steckler enter the conference room wearing a hat (baseball cap) bearing the name and logo of Ducks Unlimited. Although I do not recall what specific logo appeared on that hat since there are many different logos of that organization (Ex. 2 Ducks Unlimited Hats on EBay), I also recall Mr. Steckler leaving the conference at the completion of the deposition wearing the same hat bearing the name and logo of Ducks Unlimited.

I also particularly recall accompanying my husband to the deposition of former U.S. Fish and Wildlife Service representative David Putnam on January 26, 2018, which had been convened at the Hampton Inn Harrisburg East in Harrisburg Pennsylvania commencing at approximately 9:00 a.m. I recall during the deposition that Mr. Putnam stated he had been a member of Ducks Unlimited for a period of probably ten (10) years during his employment with the agency, including during the time that he and other United States officials at the Fish and Wildlife Service and other federal agencies had accused my husband of violating the Clean Water Act wetlands rules. (Ex. 3 David Putnam Depo 1-26-18 at 156). I also recall that Mr. Putnam stated that he had a hat that said Ducks Unlimited that he wore to work sometimes. (Ex. 3 David Putnam Depo 1-26-18 at 159). Furthermore, I recall that Mr. Putnam showed us one of his Ducks Unlimited hats at his truck in the parking lot after the completion of his deposition and during our lunch break.

I did not realize at the time of these depositions the significance of both federal government witness' affiliation with or partiality towards the Ducks Unlimited organization. However, since these depositions, I have come to learn of the significant financial and law enforcement

relationship Ducks Unlimited has had with these two federal government agencies since the 1980's, and how such relationship has negatively affected our family farming business.

I declare that, to the best of my knowledge and belief, the information herein is true, correct and complete.

FURTHER AFFIANT SAITH NOT.

DATED this 23rd day of April 2018

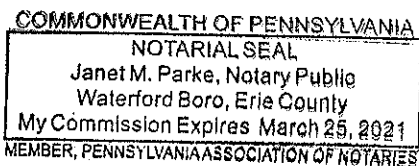

Beverly Owen Brace

NOTARY ACKNOWLEDGEMENT

SUBSCRIBED AND SWORN TO before me this 23rd day of April 2018.

STATE OF PENNSYLVANIA

COUNTY OF ERIE



Notary Public 

(SEAL)

My Commission Expires 03/25/2021

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

- - -

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.) Civil Action
ROBERT BRACE, ROBERT BRACE) No. 1:17-cv-00006-BR
FARMS, Inc., and ROBERT)
BRACE and SONS, Inc.,)
Defendants.)

- - -

Deposition of BEVERLY BRACE
Thursday, January 11, 2018

- - -

The deposition of BEVERLY BRACE, called as a witness by the Plaintiff, pursuant to notice and the Federal Rules of Civil Procedure pertaining to the taking of depositions, taken before me, the undersigned, Eileen L. Drake-Ober, a Notary Public in and for the Commonwealth of Pennsylvania, at the United States Attorney's Office, Federal Courthouse, 17 South Park Row, Erie, Pennsylvania 16501, commencing at 2:02 o'clock p.m., the day and date above set forth.

- - -



APPEARANCES:

On behalf of the Plaintiff:

United States Department of Justice:

Sarah Buckley, Esquire

Laura Brown, Esquire

Environment and Natural Resources

Division

601 D Street NW, Suite 8000

Washington, DC 20044

On behalf of the Defendants:

Kogan Law Group:

Lawrence A. Kogan, Esquire

100 United Nations Plaza, Suite 14F

New York, New York 10017

- - -

Also present:

Robert Brace

Ronald Brace

I-N-D-E-X

EXAMINATION BY:

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Ms. Buckley

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25

1 BY MS. BUCKLEY:

2 Q We'll use specific questions and get
3 that all out --

4 A All right.

5 Q -- and if you don't know --

6 A Just so you know that.

7 Q -- then, like I said, if you don't
8 know, you can say you don't know.

9 A All right.

10 Q But to the extent that you do know
11 something, if you can let me know what you do
12 know.

13 A Okay.

14 Q So this I hope you do know. Could you
15 please describe your education for me?

16 A Yes. I graduated from Fort LeBeouf.
17 That was the first class in 1956.

18 Q All right. And can you please
19 describe your employment history since you
20 graduated in 1956?

21 A Since I graduated?

22 Q Yes.

23 A I worked for three to four years
24 before I married Bob.

25 After we got married, I didn't work on

Page 19

1 the farm for our first few years, then I started
2 working, and my part in this family business here
3 is first I'm a wife, a mother, a grandmother, and
4 a G.G., and I actually lost my job with this
5 family business because of the government. They
6 come in, they stopped us from raising cabbage and
7 potatoes. That was my -- I was an asset in those
8 two businesses. But that is where I -- I do
9 not -- after we lost all that, I do not work in
10 the office. I have been in the office a lot
11 lately trying to find papers for this.

12 Q Okay.

13 A But that's it.

14 Q We'll get into the office in just a
15 second. I want to start at the beginning.

16 You said you worked for a few years
17 before you got married to Bob.

18 A Um-hum.

19 Q What were you doing during that time?

20 A I worked at an insurance office.

21 Q Okay. And what were you doing for the
22 insurance office?

23 A What was I doing? A little bit of
24 everything. Office work.

25 Q Did office work include, for instance,

1 typing?

2 A It included typing, filing, waiting on
3 customers, um-hum.

4 Q Okay. And did you have any role in
5 the finances? Did you do any bookkeeping for the
6 insurance office?

7 A No. Oh, Lord, no.

8 Q Okay. Great.

9 After you married Bob, I know you said
10 that your main part in the business has been as a
11 wife, mother, grandmother, et cetera.

12 A Um-hum.

13 Q Did you do any other work for the
14 family business at that time?

15 A No.

16 Q No?

17 A No.

18 Q Okay. So when you said that you --
19 given as you said, some government dealings --

20 A Um-hum.

21 Q -- when you said you lost your job
22 because of that, what job did you lose?

23 A I basically ran the packing shed. We
24 raised 400 acres of cabbage and however many acres
25 of potatoes. I ran it. There would be 35 to

1 40 people, and I would run that, and I was a great
2 asset for that, because a lot of people couldn't
3 do that, but in order to work with that -- so many
4 people, you had to work right with them, and I
5 loved working with my hands, and I would work
6 right with them, never ask them to do anything
7 that I would not do, and that's why it was so
8 successful.

9 Q I think that's a great quality of
10 leadership.

11 A Well, thank you.

12 Q Can you explain to me what a packing
13 shed is?

14 A A packing house is -- well, there's a
15 conveyor -- I call it a conveyor. Well, they
16 actually called it the packing table, but it's
17 like a conveyor, and it's quite a process, and I
18 would have people standing there. You had to pack
19 50 pound boxes. The cabbage had to be good or it
20 would get turned down. You had to pack certain
21 types head -- certain types of head. You couldn't
22 pack great big heads. And when I was young, I
23 would raise -- I could raise 50 pound boxes up to
24 five high, but I can't lift one.

25 Q Not sure I could now.

1 You said -- or, let me ask this, where
2 was the packing shed located?

3 A Route 97.

4 Q Is that --

5 A That was the main packing shed.

6 Q Um-hum.

7 Where -- how many packing sheds were
8 there?

9 A And there was one other up at the
10 Homestead.

11 Q Okay. So there were two packing
12 sheds?

13 A Um-hum.

14 Q The packing shed on Route 97 --

15 A Um-hum.

16 Q -- is that property that you still
17 own?

18 A Yes.

19 Q And when I say you, is that you and
20 Bob, personally?

21 A I doubt that, very much. In this
22 family business, everything is intertwined. I
23 don't know, and I really don't care who owns what.

24 Q Got you.

25 A That's just the way I am.

1 Q Right.

2 A I would think that maybe would be the
3 sons, but I'm not sure.

4 Q Okay. And when you said you had
5 worked with 35 to 40 people --

6 A Um-hum.

7 Q -- in the packing shed --

8 A Um-hum.

9 Q -- was that -- were those employees of
10 Brace and Farms?

11 A Those were --

12 Q Brace Farms?

13 A -- people that we also started out --
14 it was with school kids, and then it got to the
15 place where you couldn't get school kids, and
16 there would be a lot of people that would want to
17 come to work there, ladies maybe that wanted to
18 work and save their money for Christmas gifts, and
19 then when that got where the people weren't doing
20 that, and that's when we got Mexicans in, and we
21 had H2A people, which were excellent workers.

22 Q And would those workers be work full
23 time?

24 A Yes.

25 Q Would they be working full time on a

1 seasonal basis or on a --

2 A On a seasonal basis, um-hum.

3 Q What part of the season would they
4 work?

5 A Well, we would start -- I'm going to
6 guess maybe the last of April, might be wrong, but
7 I think it's April, and we would -- I try -- like,
8 the cabbage and the potatoes finished up by the
9 end of October, although I can remember doing it
10 in the snow.

11 Q Um-hum.

12 The cabbage and potatoes that you were
13 packing in this packing shed, were those harvested
14 from the farms tracts that are depicted on the map
15 that I have shown you that is Exhibit BE 3?

16 A I -- I can't answer that, no. I don't
17 know.

18 Q Could they have been?

19 A Yes, they could have been from -- from
20 the Homestead, yes, they could have been.

21 Q Okay.

22 A But I don't know which fields, because
23 I -- I just don't know.

24 Q Right.

25 Were there -- were there other fields

1 that the cabbage and potatoes were coming from, as
2 well?

3 A Yes, yes. It was rented ground.

4 Q Okay. And when you were working in
5 the packing shed, were you doing so as an employee
6 of the company --

7 A No.

8 Q -- Brace Farms?

9 No?

10 A I never got a paycheck. When we got
11 all done, my husband -- and I never took a
12 paycheck. He bought me a new car. I said, "I
13 don't need a new car, my car is running fine," but
14 I got a new car, and I still have it.

15 Q Have you received a paycheck from any
16 other company or individual since you have been
17 married to Bob?

18 A For -- for working and doing
19 something?

20 Q Um-hum, yes.

21 A I've been -- not that I can think of
22 right now no.

23 Q So you -- you wouldn't have received a
24 W-2 from an employer over the last --

25 A No, no.



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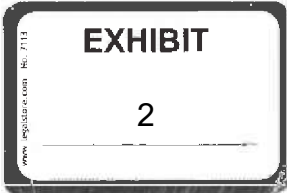
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Style : Strapback. It feels like faux leather, but I'm sure it isn't, not exactly sure what it is. The hat has a washed out/faded look. Has slightly frayed/distressed edges. Has a colorful mallard duck...

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Item location: Pennsylvania

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Navy/Brown. Woven cotton/polyester twill. Adjustable closure. 6-panel design for durability. One size fits most.



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Orange Camo Trucker Hat. Fremont, WI.
Snapback Closure. Ducks Unlimited.



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This cap is in excellent used condition.

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I was told that they were part of a collection of hats that had been displayed on a wall.

VINTAGE DUCKS UNLIMITED HAT Adjustable Embroidered S...



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Vintage and collectible. New condition very slightly worn. Ducks Unlimited Baseball hat



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TAKE A LOOK AT PICTURES.



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Blaze orange. Embroidered lettering and graphics. Strapback adjustable hat.

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Ladies Cap Ducks Unlimited Hat Pink Camo ~ New

\$8.49

Pink camo with duck unlimited logo embroidered in white. Cotton/polyester blend twill. Ladies Hunting Hat.

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BASEBALL CAP HAT. STRAP BACK
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Vintage 80/90's Ducks Unlimited Snapback Hat

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DETA...



Ducks Unlimited Cap Adjustable Free Shipping to USA

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Free Shipping



DUCKS UNLIMITED BRAND ADJUSTABLE SIZE HAT W/ BL...

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Photos - No sweat marks - Clean.



Ducks Unlimited Advantage Camo Sun Hat Wide Brim Vented ...

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Buy It Now

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Ducks Unlimited Camouflage Adjustable Hat Cap

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Free Shipping

2 watching

Classic Ducks Unlimited design. Realtree camo pattern is "The hardest working PATTERN for the hardest working HUNTER." Realtree Camo. Tattered duck head embroidered on front.



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New with tags, never worn. Ducks Unlimited baseball cap.



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NWT

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This is a really nice well made cap.

[Ducks Unlimited Hat Tan Khaki](#)



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NEW Ducks Unlimited Faded Black w/ embroidered Gray Logo...



\$14.95
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NEW Casual Classic from Ducks Unlimited. Embroidered logos in gray on front. Color: Heavily washed Black.



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Buy It Now
Brand new hat

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Lot of 10 Men's pre owned hats Please look at pictures for most accurate item details - Thanks for looking!



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\$5.59
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Slightly curved Brim. 100% Cotton. Made in Sri Lanka. Nice coloring. Khaki with Black, Marone, Yellow Emblem and lettering. Back of Hat says "Cedar Lake, Indiana. Was in hat collection.



ducks unlimited, hat, hunting, cammo, cammo hat, camping hat

\$13.15

Like new condition, adult one size

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Brand new with tags Mossy Oak Ducks Unlimited hat

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MO Shadow Grass Blades. Woven cotton/polyester twill. Adjustable closure. 6-panel design for durability. One size fits most.

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Ducks Unlimited kahki lite brown hunting Hat NEW snapback ...

\$29.65
Buy It Now

Left side edge of front brim has just faint trace of light color fade from storage, still looks nice.

Ducks Unlimited 1937 Dorfman Pacific 100% Cotton Strapbac...

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Hat has been thoroughly cleaned, ready to wear. My detailed photos are of THE EXACT



or Best Offer
hat you will receive. I also hand-wash & air-dry or spot clean the majority of my hats.



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Ducks Unlimited logo embroidered on front. -
Slightly curved beige brim. - Adjustable
snapback strap fits most heads. Unworn
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brown adjustable cap / hat. - "DUCKS
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- "COMMITTEE" embroidered on back. -
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Ducks Unlimited adjustable hat outdoor cap Co

A nice Ducks Unlimited adjustable hat.
Please look at the photos for final condition



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or Best Offer

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DUCKS UNLIMITED. Camouflage Trim HAT
CAP. Item is sold As Is, As Pictured and As
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17 (212) 644-9240

18 lkogan@koganlawgroup.com

19
20 FOR - DEFENDANTS

21
22 ALSO PRESENT:

23
24 ROBERT BRACE

25 BEVERLY BRACE

1 call somebody and say okay, what do you do? That's why we
2 have attorneys that we can consult with.

3 Q No. Of course. But these rules are rather
4 complex, are they not?

5 A Yes.

6 Q Okay. Now, let's shift subject matter now. Were
7 you, Mr. Putnam, ever from the beginning of your tenure at
8 Fish and Wildlife Service a member of a private
9 organization that contributed to the conservation and
10 preservation of wetlands?

11 A A private organization? I've been a member of
12 the Wildlife Society and a number of different --

13 Q Have you been a member for instance of Ducks
14 Unlimited?

15 A Yes.

16 Q Can you -- do you recall how long your membership
17 in Ducks Unlimited was and when?

18 A Probably ten years.

19 Q When did it begin approximately?

20 A I can't tell you. I mean, I --

21 Q Would it have begun back in the 1980's?

22 A I don't remember. We had a -- we had a chapter,
23 a local -- well, we had a local chapter of Ducks Unlimited,
24 but we also -- my job also involved restoring wetlands, and
25 we received funding from Ducks Unlimited for some period of

1 Q Do you have a hat that says Ducks Unlimited on
2 it?

3 A We had a fallout with Ducks Unlimited.

4 Q But have you ever worn a hat that said --

5 A I have, yes.

6 Q Have you worn that hat into work working for the
7 Fish and Wildlife Service?

8 A I wouldn't be surprised. I mean, it's just a
9 camo hat. You know, I've got ten camo hats.

10 Q Right. But it says Ducks Unlimited. It's a camo
11 hat that says Ducks Unlimited. Did you wear a hat that
12 said Ducks Unlimited -- do you recall wearing a hat that
13 said Ducks Unlimited into work when you were working for
14 the Fish and Wildlife Service?

15 A I could not quote a specific time, but I would
16 not --

17 Q You would not rule it out is what you're saying?

18 A No, absolutely. No.

19 Q Okay. That's all that I need to know because I
20 know that there are other people that did do that.

21 MS. BUCKLEY: Objection to counsel's testimony.

22 BY MR. KOGAN:

23 Q Now -- objection noted. Have you ever been a
24 member of the National Fish and Wildlife Federation?

25 A I have to think about that. National Fish and